REMARKS

The Office Action dated May 22, 2008 has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 1-3, 5-14, 16-40, and 42-53 are currently pending in the application, including independent claims 1, 38, 47, and 50-53. More specifically, Applicants herein amended claims 1, 38, 47, and 50-53. Entry of the amendments is respectfully requested because these amendments add no new subject matter to the present application and serve only to place the present application in better condition for examination by more particularly pointing out and distinctly claiming the subject matter that the Applicants regard as the invention. It is believed that all grounds for rejection in the Office Action have been addressed and that the present application is currently in condition for allowance in view of the amendments and the following comments. Reconsideration and allowance of claims 1-3, 5-14, 16-40, and 42-53 are respectfully requested.

Rejections under 35 U.S.C. §103(a)

Claims 1-3, 5-6, 8-14, 16-30, 32-40, and 42-53 were rejected under 35 U.S.C. 103(a) as being unpatentable over 3GPP TS 33.107 V.6.0.0 (2003-9) (3GPP33.107). Referring, for example to claim 1, the Office Action alleged that 3GPP33.107 discloses all the recited limitations except for a mapping function that translates target indications of the first network to corresponding target indications of the second network associated with a same monitored user, but that this limitation is obvious in view of the disclosure in

3GPP33.107 that a mapping function is intrinsically provided between LEMF network and a monitored network. However, as described below, Applicants respectfully submit that 3GPP33.107 fails to disclose or suggest all of the features recited in any of the pending claims.

Independent claim 1, from which claims 2-3, 5-6, 8-14, 16-30, 32-37 depend, relates to a method comprising monitoring signalling information related to at least one session involving at least a first network and a second network of different types, one of the first and second networks being an internet protocol based network and another of the first and second networks being a general packet radio service network or a universal mobile telecommunication system based network. Session content related to the same at least one session in monitored, where the signalling information is provided in at least one of the first and second networks and the session content is provided in another of the first and second networks. An indication to start interception between the first and second networks is delivered, wherein one of a network element and a function of the first network sends lawful interception information directly to one of a support node of the second network, an administration function, and a delivery function. Also, a mapping function is provided to translate target indications of the first network to corresponding target indications of the second network associated with a same monitored user. Furthermore, the at least one session is intercepted.

Independent claim 38, from which claims 39-40 and 42-46 depend, relates to an apparatus comprising a processor configured to monitor signalling information related to at least one session involving at least a first network and a second network of different

types, one of the first and second networks being an internet protocol based network and another of the first and second networks being a general packet radio service network or universal mobile telecommunication system based network. The processor is further configured to monitor session content related to the same at least one session, wherein the signalling information is provided in one of the first and second networks, and wherein the session content is provided in another of the first and second networks. The appratus of claim 38 further incldues a transmitter configured to deliver an indication to start interception between the first and second networks. In this appratus, one of a network element and a function of the first network sends lawful interception information directly to one of a support node of the second network, an administration function, and a delivery function. Also, a mapping function is provided which translates target indications of the first network to corresponding target indications of the second network associated with a same monitored user.

Independent claim 47, from which claims 48-49 depend, relates to an apparatus comprising a transmitter configured to deliver an indication to start interception between first and second networks of different types. The apparatus is configured for the interception of at least one session involving the first network and the second network, one of the first and second networks being an internet protocol based network and another of the first and second networks being a general packet radio service network or universal mobile telecommunication system based network. Also, the apparatus is configured to monitor signaling information provided in one of the first and second networks of the at least one session and session content related to the same at least one

session provided in another of the first and second networks, and to deliver an indication to start interception between the first and second networks. Specifically, one of a network element and a function of the first network is configured to send lawful interception information directly to one of a support node of the second network, an administration function, and a delivery function. Also, a mapping function is provided and is configured to translate target indications of the first network to corresponding target indications of the second network associated with a same monitored user.

Independent claim 50 relates to an apparatus, comprising monitoring means for monitoring signalling information, provided in one of a first and second networks of different types, of at least one session, and session content related to the at least one session provided in another of the first and second networks. One of the first and second networks is an internet protocol based network, and another of the first and second networks is either a general packet radio service network or universal mobile telecommunication system based network. The apparatus of claim 50 further includes delivery means for delivering an indication to start an interception between the first and second networks. One of a network element and a function of the first network is configured to send lawful interception information directly to one of a support node of the second network, an administration function, and a delivery function. Also, a mapping function is provided, and this function is configured to translate target indications of the first network to corresponding target indications of the second network associated with a same monitored user.

Independent claim 51 relates to a computer readable medium comprising computer executable instructions to perform a method. The method comprises monitoring signalling information, where this information is provided in at least one of first and second networks of different types, of at least one session, and session content related to the same at least one session provided in another of the first and second networks. In particular, one of the first and second networks is an internet protocol based network and another of the first and second networks is a general packet radio service network or universal mobile telecommunication system based network. An indication to start interception is delivered between the first and second networks, such that one of a network element and a function of the first network sends lawful interception information directly to one of a support node of the second network, an administration function, and a delivery function. Also, a mapping function is provided which translates target indications of the first network to corresponding target indications of the second network associated with a same monitored user.

Independent claim 52 relates to an apparatus configured to monitor signalling information, provided in one of a first and second networks, of the at least one session, and session content related to the same at least one session provided in another of the first and second networks; one of the first and second networks being an internet protocol based network and another of the first and second networks being a general packet radio service network or universal mobile telecommunication system based network, wherein an indication is delivered to start interception between the first and second networks. One of a network element and a function of the first network sends lawful interception

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information directly to one of a support node of the second network, an administration function, and a delivery function. A mapping function is provided which translates target indications of the first network to corresponding target indications of the second network associated with a same monitored user.

Independent claim 53 relates to an apparatus configured to deliver an indication to start interception of a session between a first network and a second network of different types. Signalling information of the session in one of the first and second networks is monitored, and session content related to the session in another of the first and second networks is monitored. One of the first and second networks is an internet protocol based network, and another of the first and second networks is a general packet radio service network or universal mobile telecommunication system based network. One of a network element and a function of the first network is configured to send lawful interception information directly to one of a support node of the second network, an administration function, and a delivery function. A mapping function is provided and is configured to translate target indications of the first network to corresponding target indications of the second network associated with a same monitored user.

Applicants respectfully submit that each of the pending claims recites features that are neither disclosed nor suggested in 3GPP33.107.

3GPP33.107 relates to 3G security by providing a lawful interception architecture and related functions. In 3GPP33.107, FIGS. 1A-1C each illustrates different intercept configurations, each including mediation functions (ADMF), delivery functions 2, 3 and a law enforcement monitoring facility (LEMF). Specifically, FIG. 1A refers to a circuit

switched intercept configuration having a media gateway (MGW) and MSC server. Similarly, FIG. 1B illustrates a packet switched intercept configuration having a GSN, GPRS support node.

In this rejection, the Office Action states at the last paragraph of page 4 that "3 GPP 107 discloses the <u>LEMF being an IMS</u> under 3 GPP architecture and GSN being a GPRS support <u>network</u>" (Empahsis added). Applicants urge that the Office Action is legally and technically incorrect to allege that the LEMF is a network, let alone an internet protocol (IP) Multimedia Subsystem (IMS) for delivering IP multimedia to mobile users. Applicants have carefully reviewed the Further, could find no disclosure in 3GPP33.107 defining LEMF to be an IMS. Applicants further urge that the statement is inaccurate because a GSN is a GPRS support <u>node</u>, and not the alleged GPRS support <u>network</u>. Instead, as described in the present application, a LEMF is not a part of a customary IMS network. Furthermore, 3GPP33.107 neither refers to an IMS network. not discusses IMS network structure or functions.

For at least these reasons, 3GPP33.107 does not teach or suggest, for example, the recitation in claim 1 of "monitoring signalling information related to at least one session involving at least a first network and a second network of <u>different types</u>." In this way, Applicants note that the claim 1 is allowable over 3GPP33.107 for at least the reason that this reference does not relate to lawful interceptions over different types of networks, such as an IMS-based network.

To clarify this technical distinction and to expedite allowance of the present application, independent claim 1 have been amended to include the recitation that "one of

the first and second networks being an internet protocol based network and another of the first and second networks being a general packet radio service network or universal mobile telecommunication system based network." Support for the this amendment can be found in the present application, for example, at the last sentence in paragraph [0001]. As described above, this limitation is not taught or suggested in

For at least these reasons, 3GPP29.207 neither teaches nor suggests each and every limitation contained in independent claim 1. Likewise, independent claims 38, 47, and 50-53, although different in scope from claim 1, recite similar limitations related to lawful interception and mapping between two different network types, and are consequently allowable, along with their dependent claims, over the combination of 3GPP29.207 and 3GPP33.107. Reconsideration and allowance of claims 1-3, 5-6, 8-14, 16-30, 32-40, and 42-53 are respectfully requested.

Claims 7 and 31 were rejected under 35 U.S.C. §103(a) as being unpatentable over 3GPP33.107 in view of 3GPP TS 29.207 V5.5.1 (2003-10) (3GPP29.207). The Office Action took the position that 3GPP33.107 disclosed the limitations of claim 1 and 3GPP29.207 disclosed the additional limitations of claims 7 and 31. As described above, 3GPP33.107 fails to disclose every limitation of claim 1, and 3GPP29.207 fails to cure these deficiencies. Therefore, claims 7 and 31 are allowable over the combination of 3GPP33.107 and 3GPP29.207 for at least the reason that these references fail to teach or suggest each and every limitation in any of the pending claims.

As described above, 3GPP33.107 fails to disclose or suggest, for example, the limitation of :

> monitoring signalling information related to at least one session involving at least a first network and a second network of different types, one of the first and second networks being an internet protocol based network and another of the first and second networks being a general packet radio service network or universal mobile telecommunication system based network.

3GPP29.207 does not relate to monitoring different network types and therefore cannot cure this deficiencies. Instead 3GPP29.207 relates to policy Control over a Go interface, the interface between the GGSN and the Policy Decision Function (PDF). For example, 3GPP29.207 relates to a protocol to be used between PDF and GGSN over the Go interface, the signalling interactions to be performed between PDF and GGSN over the Go interface, and data to be exchanged between PDF and GGSN over the Go interface.

Thus, each of the pending claims currently recites subject matter which is neither disclosed nor suggested in either 3GPP29.207 or 3GPP33.107. Furthermore, as admitted in the Office Action, neither 3GPP29.207 nor 3GPP33.107 relate to mapping functions and, therefore, the combination does not teach or suggest the recitation in claim 1 that "a Mapping Function is provided which translates target indications of the first network to corresponding target indications of the second network associated with a same monitored user."

For at least these reasons, the combination of 3GPP29.207 and 3GPP33.107 neither teaches nor suggests each and every limitation contained in independent claim 1.

Dependent claims 7 and 31 are therefore allowable for at least the reasons of depending from allowable claim 1, as well as for the separate limitations recited in each of these claims. Reconsideration and allowance of claims 7 and 31 in view of these comments are respectfully requested.
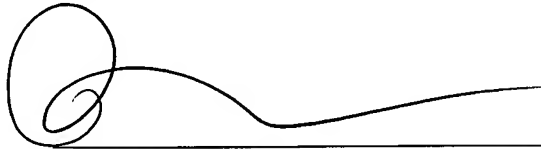
Conclusion

As discussed above, each of the pending claims 1-3, 5-14, 16-40, and 42-53, including independent claims 1, 38, 47, and 50-53 recites subject matter which is neither disclosed nor suggested in the cited references. Applicants submit that the recited subject matter is more that sufficient to render the invention non-obvious to a person of ordinary skill in the art. It is respectfully requested that independent claims 1, 38, 47, and 50-53 and the related dependent claims be allowed in view of the above arguments comments and remarks and that the present application be allowed to pass to issue.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicants' undersigned representative at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,

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